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5 Attorney for  
BLACK & VEATCH CONSTRUCTION, INC.  
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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
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12 In Re:  
13 PG&E CORPORATION,  
14 - and -  
15 PACIFIC GAS AND ELECTRIC  
COMPANY,  
16 Debtors.  
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Bankruptcy Case  
Case No.: 19-30088-DM (Lead Case)  
Chapter 11

(Jointly Administered)

**MOTION FOR ORDER  
AUTHORIZING WITHDRAWAL OF  
COUNSEL**

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MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL

1 **Facts**

2 1. Black & Veatch Construction Inc. (“Black & Veatch”) respectfully submits this Motion for  
3 Order Authorizing Withdrawal of Counsel of Natalie K. Sanders to Black & Veatch Construction,  
4 Inc. (the “Motion”) pursuant to Rules 7007-1, 9013-1, 9013-2, 9013-3 and 9014-1 of the Bankruptcy  
5 Local Rules.

6 **Argument**

7 2. Pursuant to Rule 11-5(a) of the Local Civil Rules in force in the Northern District of California,  
8 “counsel may not withdraw from an action until relieved by order of Court after written notice has  
9 been given reasonably in advance to the client and to all other parties who have appeared in the  
10 case.”

11 3. Cause exists for Ms. Sanders to withdraw as counsel to Black & Veatch in the above-captioned  
12 cases because Ms. Sanders will no longer be affiliated with the firm Baker Botts LLP.

13 4. Additionally, Black & Veatch’s primary counsel, Jonathan Shapiro, who is now affiliated with  
14 the law firm Goodwin Procter LLP will continue to represent them in this matter.

15 **Conclusion**

16 5. For the foregoing reasons and for the reasons set forth in the Declaration of Natalie K. Sanders,  
17 submitted in support of this Motion, Black & Veatch respectfully requests that the Court enter an  
18 Order granting Natalie K. Sanders leave to withdraw as counsel of record for Black & Veatch.  
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1 DATED: June 23, 2022

Respectfully submitted,

2 **BAKER BOTTS L.L.P.**

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4 /s/ Natalie K. Sanders

5 Natalie K. Sanders

6 Attorney for Black & Veatch Construction, Inc.  
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